



State of Utah  
DEPARTMENT OF NATURAL RESOURCES  
DIVISION OF WILDLIFE RESOURCES

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WATER RIGHTS  
SALT LAKE

February 10, 1995

Mr. Robert L. Morgan, P.E.  
State Engineer  
Division of Water Rights  
1636 West North Temple  
Salt Lake City, Utah 84116

Subject: Change Applications a-18510 67-47  
Swallow Sons, Pavhant Valley

Dear Bob:

The following letter of concern is provided for your review of the above referenced filing.

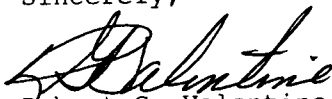
The Division of Wildlife Resources is concerned that the continued development of wells in the Flowell District could result in adverse impacts to the decreed water rights for the Clear Lake Waterfowl Management Area. The State Engineer and the Division of Wildlife Resources cooperated in a study that resulted in "Geological Survey, Water-Supply Paper 1839-E," wherein it states "pumping from the basalt aquifer in the Flowell District, Well (C-21-5)7cdd2, causes a proportionally greater change in the rate of spring flow than does pumping in the Kanosh district."

In light of the action taken recently regarding the creation of a distribution system and the relaxing of control on ground water withdrawal, the Division feels it necessary to continue to petition the State Engineer to prudently consider change applications filed in the Flowell District.

The Division is not requesting a hearing on this matter, but we are in a position to attend such a hearing to justify our position and in support of our concerns.

We appreciate the opportunity for comment on this application and appreciate the association of our divisions. Thank you for your consideration in this matter.

Sincerely,

  
Robert G. Valentine  
Director

RGV/LS/kj

WLS\WP\PROTEST

